

UNITED STATES DISTRICT COURT FOR THE EASTERN
DISTRICT OF PENNSYLVANIA

Tawoos Bazargani, M. D.
40 Old Lancaster Road, No.406
Merion, Pennsylvania 19066.

Plaintiff

vs.

13 6176

Ms. Tammy Radel
Pennsylvania State Board of Medicine
2601 North Third Street
Harrisburg, PA. 17110

And

Pennsylvania State Board of Medicine
2601 North Third Street
Harrisburg, PA. 17110

And

Commonwealth of Pennsylvania
Department of State
Bureau of Professional and Occupational Affairs
2601 North Third Street
Harrisburg, PA. 17110

Defendants

NOTICE TO DEFEND

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

You should take this paper to your lawyer at once. If you do not have a lawyer or cannot afford one, go to or telephone the office set forth below to find out where you can get legal help.

Philadelphia Bar Association
Lawyer Referral
and Information Service
One Reading Center
Philadelphia, Pennsylvania 19107
(215) 238-6333
TTY (215) 451-6197

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta ascender una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademias, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

Lleve esta demanda a un abogado inmediatamente. Si no tiene abogado o si no tiene el dinero suficiente de pagar tal servicio. Vaya en persona o llame por telefono a la oficina cuya direccion se encuentra escrita abajo para averiguar donde se puede conseguir asistencia legal.

Asociacion De Licenciados
De Filadelfia
Servicio De Referencia E
Informacion Legal
One Reading Center
Filadelfia, Pennsylvania 19107
(215) 238-6333
TTY (215) 451-6197

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Commonwealth of Pennsylvania
Department of State
Bureau of Professional and Occupational Affairs
2601 North Third Street
Harrisburg, PA. 17110

Defendants

Civil Action

No. **13** **6176**

ORDER

Upon consideration of Plaintiff Tawoos Bazargani, M. D.' s
Complaint and the Response there to, it has been Ordered and Decreed in
favor of Plaintiff' s Complaint.

J

UNITED STATES DISTRICT COURT FOR THE EASTERN
DISTRICT OF PENNSYLVANIA

Tawoos Bazargani, M. D.
40 Old Lancaster Road, No.406
Merion, Pennsylvania 19066.

Plaintiff

vs.

Ms. Tammy Radel
Pennsylvania State Board of Medicine
2601 North Third Street
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And

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2601 North Third Street
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And

Commonwealth of Pennsylvania
Department of State
Bureau of Professional and Occupational Affairs
2601 North Third Street
Harrisburg, PA. 17110

Defendants

Civil Action

No.

13 6176

COMPLAINT

Plaintiff Tawoos Bazargani, M. D. hereby moves pursuant to Title VII of the Civil Rights Act of 1964 to file the instant Complaint, this Complaint follows Plaintiff's Discrimination Complaint filed against the above Defendants on May 30, 2013, in the United States Equal Employment Opportunity Commission, which was dismissed for lack of jurisdiction and on August 1, 2013, United States Equal Employment Opportunity

Commission issued its “ Dismissal And Notice Of Rights “ a copy of which is attached to the instant Complaint.

UNDERLYING FACTS

1. Plaintiff Tawoos Bazargani, M. D. (hereinafter “ Plaintiff or Dr. Bazargani “) is an adult individual who is and, at all relevant times, has been a resident of 40 Old Lancaster Road, No.406, Merion, Pennsylvania 19066.

2. Defendant Ms. Tammy Radel is an adult individual who has operated as Administrator of Pennsylvania State Board of Medicine and has supervised the operations of all those offices which have operated under her authority who is and, at all relevant times, has maintained an office at the Office of Pennsylvania State Board Medicine, 2601 North Third Street, Harrisburg, Pennsylvania 17110.

3. Defendant Pennsylvania State Board of Medicine is an entity which has been constituted and, therefore, operated under the rules and regulations of the state of Pennsylvania, which is and, at all relevant times, has been located at 2601 North Third Street, Harrisburg, Pennsylvania 17110.

4. Defendant Commonwealth of Pennsylvania, Department of State, Bureau of Professional and Occupational Affairs is an entity which has been constituted and, therefore, operated under the rules and regulations of the state of Pennsylvania, which is and, at all relevant times, has been located at 2601 North Third Street, Harrisburg, Pennsylvania 17110.

5. Defendant Commonwealth of Pennsylvania, Department of State, Bureau of Professional and Occupational Affairs as identified above in paragraph number four (parag. No.4) has, on a ongoing basis during the

entire period of Dr. Bazargani' s practice as a physician in the state of Pennsylvania, till December 31 2006, communicated and corresponded with Dr. Bazargani in reference to matters involving Dr. Bazargani' s license in medicine, included but not limited, to renewing Dr. Bazargani' s Medical License, therefore, providing Dr. Bazargani with the application for renewal of her Medical License.

6. Application for medical license as documented above in paragraph number five (parag. No.5), in the state of Pennsylvania, has been composed of several pages of questions about the physician' s entire personal history including the graduated medical school.

7. Plaintiff Dr. Bazargani is a physician and also a psychiatrist who has, very successfully practiced medicine and therefore maintained consistently a valid Medical License, in the state of Pennsylvania, from the year 1978 through December 31, 2006, a true and correct copy of Dr. Bazargani' s employment contract, as a psychiatrist, where she has been employed for ten (10) years, has been attached here and marked as Exhibit A.

8. Plaintiff Dr. Bazargani has, during her entire period of her practice, routinely received her application for renewal of her Medical License, spontaneously, from Commonwealth of Pennsylvania, Department of State, Bureau of Professional and Occupational Affairs, prior to December 2006, see Exhibit A for Dr. Bazargani' s employment contract as a psychiatrist with her employer where she has been employed for ten (10) years.

9. In fall of year 2006 Plaintiff Dr. Bazargani has not received

any application from Commonwealth of Pennsylvania, Department of State, Bureau of Professional and Occupational Affairs which she had previously received, every two years (see Exhibit A for employment document).

10. In fall of year 2006 Plaintiff Dr. Bazargani has not received any documentation involving any explanation about not receiving any application from Commonwealth of Pennsylvania, Department of State, Bureau of Professional and Occupational Affairs for renewal of her Medical License which she had spontaneously received during her entire practice (see Exhibit A).

11. Although Defendant Pennsylvania State Board of Medicine has official and legal responsibility in providing physicians with the medical license while practicing medicine in the state of Pennsylvania, unless otherwise ordered by the law, inexplicably, Defendant has not, since fall of year 2006, provided Dr. Bazargani with any Medical License.

12. Defendant Ms. Tammy Radel, as the ultimate responsible office, who has responsibility in supervising the offices responsible for providing physicians with the medical license, while practicing medicine in the state of Pennsylvania, unless otherwise ordered by the law, while under direct supervision of the previous Governor of the State of Pennsylvania has shown no responsibility, in providing Dr. Bazargani with a renewed Medical License.

13. Defendant Ms. Tammy Radel, as the ultimate responsible office, who has responsibility in supervising the offices responsible for providing physicians with the medical license, while practicing medicine in the state of Pennsylvania, unless otherwise ordered by the law, while under direct supervision of the previous Governor of the State of Pennsylvania

has shown no responsibility, in providing Dr. Bazargani with any reason for not mailing application, therefore, not renewing Dr. Bazargani' s Medical License.

14. Consequent to not receiving application for renewal of Plaintiff Dr. Bazargani' s Medical Licenses, from the Commonwealth of Pennsylvania, Department of State, Bureau of Professional and Occupational Affairs, prior to expiration of her Medical License in the fall of 2006 which she had, spontaneously, received during the entire period of her medical practice, the renewal of Plaintiff Dr. Bazargani' s Medical License has lapsed her attention.

15. Early in June 2007 Plaintiff Dr. Bazargani was informed by her employer about her expired Medical License.

16. Plaintiff Dr. Bazargani immediately after noticing her expired Medical License, in order to minimize damages of her abrupt cessation of her practice upon her patients and damages upon her own, on June 8, 2007, she has written her letter about renewing her Medical License to Defendant Pennsylvania State Board of Medicine a true and correct copy of this letter is attached here and marked as Exhibit B.

17. Plaintiff Dr. Bazargani has, with her letter of June 8, 2007 to Defendant Pennsylvania State Board of Medicine, about renewing her medical license, attached her check for \$360.00, the amount required for renewal of medical license in the state of Pennsylvania (see Exhibit B).

18. On June 19, 2007 the Defendant State Board of Medicine has cashed Plaintiff Dr. Bazargani' s check for \$360.00 which was written for renewal of her Medical License, inexplicably, Defendant has made no

attempt about renewing Plaintiff Dr. Bazargani' s Medical License, a true and correct copy of this check has been attached here and marked as Exhibit B.

19. On June 30, 2007 Plaintiff in anticipation of receiving her renewed Medical License, has written her Certified letter to the Defendant State Board of Medicine, in order, to have a remedy for her tragedy of abrupt cessation of her practice and has demanded for renewal of her Medical License a true and correct copy of this letter is attached here and marked as Exhibit C.

20. Enclosed with the letter of June 30, 2007 Plaintiff Dr. Bazargani has completed the related application for the renewal of her Medical License and has enclosed all those requirements which have been identified for the renewal of medical licenses in the state of Pennsylvania (see Exhibit C) which was ignored by the Defendant.

21. Plaintiff Dr. Bazargani on July 20, 2007 has lost her job and, therefore, her total income because of her expired Medical License, a true and correct copy of Dr. Bazargani' s termination of her employment letter after ten (10) years employment because of her expired Medical License has been attached here and marked as Exhibit D.

22. Plaintiff Dr. Bazargani' s letter of June 30, 2007 as identified above in paragraphs number nineteen through twenty (parag. No.19-20) has been followed by her letter of July 23, 2007 to Defendant Pennsylvania State Board of Medicine, while anticipating receiving her renewed Medical License, where similar to her letter of June 30, 2007 she demanded again for renewal of her Medical License, as she did not receive any response from Defendant Pennsylvania State Board of Medicine about renewing her Medical License.

23. Plaintiff's Certified letter of August 12, 2007 to Defendant Pennsylvania State Board of Medicine, in anticipation of receiving her renewed Medical License, followed her letter of July 23, 2007 and was identical, in context, as she did not receive any response from Defendant Pennsylvania State Board of Medicine about renewing her Medical License a true and correct of this letter is attached here and marked as Exhibit E.

24. Finally, Plaintiff's letter of August 26, 2007 to the Defendant Pennsylvania State Board of Medicine, while anticipating receiving her renewed Medical License, followed her letter of August 12, 2007 and was identical, in context, as she did not receive any response from Defendant Pennsylvania State Board of Medicine about renewing her Medical License.

25. Plaintiff Dr. Bazargani has undergone a quarter of century education and has successfully earned her entitlement not only as a physician but also as a psychiatrist and has successfully practiced medicine in the state of Pennsylvania, with standard patient care, from 1987 through December 31, 2006, inexplicably, despite Plaintiff's endless endowers as documented above through paragraphs number fifteen through twenty four (parag.s No.15-24) the above defendants have failed to renew Plaintiff Dr. Bazargani's Medical License and have failed to provide Plaintiff with any cause for not renewing Plaintiff's Medical License, see Exhibit A for Plaintiff Dr. Bazargani's employment contract, see Exhibit D for termination of her employment.

26. 63 P.S. section 422.25(d) clearly defines the responsibility, therefore, the liability of the Defendants as follow, " Upon receiving a proper application for such registration accompanied by the fee, if any, above provided for, the board shall issue a certificate of registration to the

applicant. Said certificate together with its renewals shall be good and sufficient evidence of registration under the provision of this act. “, see *Bullock v. Horn* 720 A.2d 1079, Cmwlt. 1998.

27. The above identified Pennsylvania Statute documented through the above paragraph number twenty six (parag.No.26) strongly clarifies Plaintiff Dr. Bazargani’ s rights and her legal entitlement and therefore violations of her legal rights and her legal entitlement as a physician in the state of Pennsylvania.

28. Plaintiff Dr. Bazargani on November 8, 2008 has written her Final Notice to Defendant Pennsylvania State Board of Medicine about Defendants’ failure to renew Plaintiff’s Medical License, a true and correct copy of this letter is attached here and marked as Exhibit F.

29. On November 21, 2008 Plaintiff Dr. Bazargani has filed her claim against the above Defendants because of not renewing her Medical License after Defendant Pennsylvania State Board of Medicine ignored Plaintiff’ s Final Notice, as identified above through paragraph number twenty eight (parag. No.28) a true and correct copy of the docket entry of Dr. Bazargani’ s claim against the above Defendants because of Defendants’ failure to renew Dr. Bazargani’ s Medical License is attached here and marked as Exhibit G. (see the Case No.08-33281, November term 2008, at Commonwealth of Pennsylvania, Montgomery County, Court of Common Pleas).

30. During the entire litigation of the claim as identified in the above paragraph number twenty nine (Parag. No.29) the Defendants’ sole defense was sovereign immunity, (see the Case No.08-33281, November term 2008, at Commonwealth of Pennsylvania, Montgomery County, Court of Common Pleas).

31. During the entire litigation of the claim as identified in the above paragraph number twenty nine (Parag. No.29) Defendants on a persistent basis have tried to cover up their illegal, victimizing and discriminatory action against Plaintiff Dr. Bazargani by their baseless excuses about the credit for continuing education, see (the Case No.08-33281, November term 2008, at Commonwealth of Pennsylvania, Montgomery County, Court of Common Pleas).

32. During the entire litigation of the claim as identified in the above paragraph number twenty nine (Parag. No.29) Defendants on a persistent basis have failed to present any cause for Defendants' failure to mail application for the renewal of Plaintiff Dr. Bazargani' s Medical License, (see the Case No.08-33281, November term 2008, at Commonwealth of Pennsylvania, Montgomery County, Court of Common Pleas).

33. During the entire litigation of the claim as identified in the above paragraph number twenty nine (Parag. No.29) Defendants on a persistent basis have failed to present any cause for not mailing application for the renewal of Plaintiff Dr. Bazargani' s Medical License, (see the Case No.08-33281, November term 2008, at Commonwealth of Pennsylvania, Montgomery County, Court of Common Pleas).

34. During the entire litigation of the claim as identified in the above paragraph number twenty nine (Parag. No.29) Defendants on a persistent basis have failed to present any cause for not renewing Defendants' Dr. Bazargani' s Medical License, (see the Case No.08-33281, November term 2008, at Commonwealth of Pennsylvania, Montgomery County, Court of Common Pleas).

35. During the entire litigation of the claim as identified in the above paragraph number twenty nine (Parag. No.29) Defendants on a persistent basis have failed to present any cause for not responding to Plaintiff Dr. Bazargani' s letters as documented above through paragraphs number sixteen through twenty four (parag. 16-24) in reference to renewal of her Medical License, (see the Case No.08-33281, November term 2008, at Commonwealth of Pennsylvania, Montgomery County, Court of Common Pleas).

36. On December 5, 2012 Plaintiff Dr. Bazargani filed her Motion demanding the above Defendants' explanation for Defendants' vindictive and discriminatory behavior of not renewing Plaintiff' s Medical License as Plaintiff despite her endless endower could not identify any cause for the above Defendants failure to renew Plaintiff' s Medical License (see docket entry at Exhibit G for this Motion).

37. On May 30, 2013 Plaintiff Dr. Bazargani has filed her Discrimination Complaint in United States Equal Employment Opportunity Commission as Defendants have failed to file any response to Plaintiff' s Motion of December 5, 2012 demanding the explanation for Defendants' vindictive and discriminatory behavior of not renewing Plaintiff Dr. Bazargani' s Medical License, for no cause, (which has been unheard of in the medical history of the state of Pennsylvania, see docket entry at Exhibit F)

38. On August 1, 2013 United States Equal Employment Opportunity Commission claimed the " lack of jurisdiction " and issued its " Dismissal And Notice Of Rights " which was followed by the instant Complaint, a true and correct copy of United States Equal Employment

Opportunity Commission' s Decision has been attached to the instant Complaint.

39. The above Defendants have not failed to provide a non Muslim physician with application for renewal of the Medical License as identified above in paragraph number six (6) for no cause what so ever.

40. The above Defendants have not failed to provide a non Muslim physician with application for renewal of the non Muslim physician' s Medical License.

41. The above Defendants have not refused to respond a non Muslim physician' s five letters about not mailing the application for renewal of such a physician' s medical license, (see above paragraphs 15-25).

42. The above Defendants' failure to renew Plaintiff Dr. Bazargani' s Medical License for no cause were motivated by bias and discrimination based on Plaintiff' s religion as a Muslim.

43. The above Defendants' failure to mail the application for renewal of Plaintiff' s Medical License was motivated by bias and discrimination based on Plaintiff' s religion as a Muslim.

44. The above Defendants' failure to mail the application for renewal of Plaintiff' s Medical License and those surrounding the refusal to respond to Plaintiff' s five letters in reference to the cause for not mailing application involving the renewal of Plaintiff' s Medical License was motivated by bias and discrimination based on Plaintiff' s religion as a Muslim.

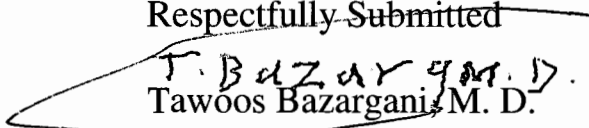
45. As the result of above Defendants' denial to renew Plaintiff Dr. Bazargani' s Medical License for no cause, what so ever, Plaintiff' s employment has been terminated and plaintiff has undergone ongoing pain

and suffering which has had a detrimental impact upon plaintiff' s ill heart, consequently, plaintiff demands for relief in excess of \$50,000.00.

WHEREFORE, Plaintiff Tawoos Bazargani, M. D. prays this Honorable Court to Order and Decree in favor of plaintiff' s instant Complaint.

Date: October 20, 2013

Respectfully Submitted

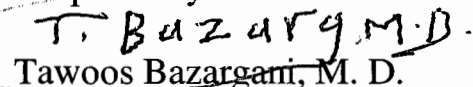

T. Bazargani, M. D.

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WHEREFORE, Plaintiff Tawoos Bazargani, M. D. prays this Honorable Court to Order and Decree in favor of plaintiff' s instant Complaint.

Date: October 20, 2013

Respectfully Submitted


Tawoos Bazargani, M. D.

UNITED STATES DISTRICT COURT FOR THE EASTERN
DISTRICT OF PENNSYLVANIA

Tawoos Bazargani, M. D.
40 Old Lancaster Road, No.406
Merion, Pennsylvania 19066.

Plaintiff

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And

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And

Commonwealth of Pennsylvania
Department of State
Bureau of Professional and Occupational Affairs
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Harrisburg, PA. 17110

Defendants

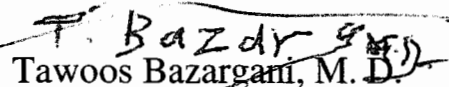
CERTIFICATE OF SERVICE

Plaintiff Tawoos Bazargani, M.D. hereby certifies that the true and correct copies of " Plaintiff Tawoos Bazargani, M. D.' s Complaint " have been deputized on the following parties on October 22, 2013

Ms. Tammy Radel
Pennsylvania State Board of Medicine
2601 North Third Street
Harrisburg, PA. 17110

Pennsylvania State Board of Medicine
2601 North Third Street
Harrisburg, PA. 17110

Commonwealth of
Pennsylvania, Department
of State, Bureau of
Professional and
Occupational Affairs
2601 North Third Street
Harrisburg, PA. 17110


Tawoos Bazargani, M. D.

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

DISMISSAL AND NOTICE OF RIGHTS

To: **Tawoos Bazargani**
40 Old Lancaster Road
Apt. 406
Merion Station, PA 19066

From: **Philadelphia District Office**
801 Market Street
Suite 1300
Philadelphia, PA 19107

☐

On behalf of person(s) aggrieved whose identity is
CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.

EEOC Representative

Telephone No.

530-2013-02389

Legal Unit

(215) 440-2828

THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:

☐

The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.

☐

Your allegations did not involve a disability as defined by the Americans With Disabilities Act.

☐

The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.

☐

Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge

☐

The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.

☐

The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.

☒

Other (briefly state)

Lack of jurisdiction

- NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form.)

Title VII, the Americans with Disabilities Act, the Genetic Information Nondiscrimination Act, or the Age Discrimination in Employment Act: This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit **must be filed WITHIN 90 DAYS of your receipt of this notice**; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

Equal Pay Act (EPA): EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

On behalf of the Commission

Enclosures(s)

Spencer H. Lewis, Jr.
District Director

8/1/13

(Date Mailed)

CC:

Dr. Andrew D. Behnke
Chairman
PENNSYLVANIA BOARD OF MEDICINE
2601 N. Third Street
Harrisburg, PA 17110



John F. Kennedy Community Mental Health/Mental Retardation Center
112 North Broad Street, Philadelphia, Pennsylvania 19102-1577 • (215) 568-0860

Delores Wilson, Esq.
President
Board of Directors

Jo Williamson, M.A.
Chief Executive Officer

June 18, 1997

Tawoos Bazargani
40 Old Lancaster Rd.
Merion, PA 19066

LETTER OF AGREEMENT

This will confirm the intention of the John F. Kennedy Community Mental Health/Mental Retardation Center to retain your services as a consultant to the Center for the following purposes:

Position: Psychiatrist
Location(s) 112 North Broad Street
Services: Consultant
Social Security #: 080-48-1942
Effective Date: June 18, 1997

It is understood that said services are provided by you as an independent contractor and not as an employee of the Center. The Center assumes no responsibility for the payment of any employer FICA taxes, unemployment insurance or worker's compensation insurance on your behalf.

It is agreed that the Center shall pay \$63.00 per hour for services rendered under this Agreement. Center agrees to make said payments promptly after receipt of a written invoice for said services delivered to the following address: John F. Kennedy Community MH/MR Center, 112 North Broad Street, Philadelphia PA.
Attention: PAYROLL.

It is understood that no payments will be made without submission by you of a written invoice to the Center.

This agreement may be terminated at any time by either party by written notice addressed to the Center at 112 North Broad Street, Philadelphia, PA. 19102 and to you at the address written above.

Please indicate your acceptance of the terms of this letter by signing where indicated below.

We look forward to a long and mutually productive relationship.


PRESIDENT

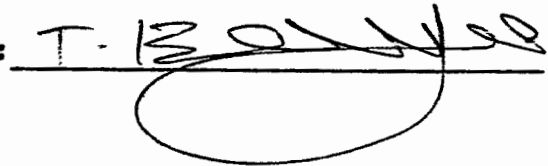
Accepted by: 

EXHIBIT PA-2

SUBCONTRACTOR'S CERTIFICATION OF NON-INDEBTEDNESS
TO THE CITY OF PHILADELPHIA

Subcontractor has entered into a Contract with Centralized Comprehensive Human Services,

Inc. t/a John F. Kennedy Community MH/MR Center ("Provider") to perform certain services in connection with Provider's Contract with the City of Philadelphia (Contract Number _____).

Subcontractor hereby certifies and represents to City that Subcontractor and Subcontractor's parent company(ies) and subsidiary(ies) are not currently indebted to the City and will not at any time during the term of Subcontractor's Contract with Provider (the "Subcontract"), including any extensions or renewals thereof, be indebted to the City, for or on account of any delinquent taxes (including, but not limited to, taxes collected by the City on behalf of the School District of Philadelphia), liens, judgments, fees or other debts for which no written agreement or payment plan satisfactory to the City has been established. In addition to any other rights or remedies available at law or in equity, Subcontractor acknowledges that any breach of or failure to conform to this certification may, at the option and direction of the City, result in the withholding of payments otherwise due to Subcontractor for services rendered in connection with the Contract and, if such breach or failure is not resolved to the City's satisfaction within a reasonable time frame specified by the City in writing, may result in the offset of any such indebtedness against said payments otherwise due to Subcontractor and/or the termination of Subcontractor for default (in which case Subcontractor will be liable for all excess costs and other damages resulting from the termination).

Self -

Name of Subcontractor

By: 

Authorized Signatory

Title: _____

President or Vice President

Print Name

Attest: _____

Secretary or Treasurer



John F. Kennedy Community Mental Health/Mental Retardation Center
112 North Broad Street, Philadelphia, Pennsylvania 19102-1577 • (215) 568-0860

Delores Wilson, Esq.
President
Board of Directors

Jo Williamson, M.A.
Chief Executive Officer

Date: June 18, 1997
To: Tawoos Bazargani
From: Joel Esterman, Vice President - Operations
Subject: Consultant Agreement

* * * * *

Attached is a consultant agreement which I would like you to review and signature. Please return the agreement to Personnel where the original will be retained and a copy sent to you.

Consultant checks are issued bi-weekly in conjunction with the payroll (see attached pay schedule). An invoice documenting hours worked and approved by the Supervisor is required and due the Monday preceding the pay period ending (see schedule). The Finance Department on the 8th floor, Room 813, receives invoices and issues checks.

Please feel free to contact me if you have questions.

Tawoos Bazargani, M.D.
Apartment No. 43
One Christian Street
Philadelphia, Pa.19147

Certified Mail No. 7006-3450-0002-1424-9467

Medical Board
P.O. Box 2649
Harrisburg, Pa. 17105

June 8.2007

Dear Medical Board:

To the date of this letter I (Tawoos Bazargani, M.D.)have not received any notice for renewal of my medical license. Enclosed please find the check No.240 for \$360.00 which is written for renewal of my medical license No. M.D. 037579-L. The application for renewal of my license has been completed online while on the telephone with a gentleman from the office at Harrisburg, Pennsylvania. If a notice has been mailed please let me know about the mailing date of the notice.

May I thank you for your consideration in this matter.

Very truly yours

Tawoos Bazargani, M.D.

TAWOOS BAZARGANI, M.D.
PH: 215-551-3135

3734801 240

Date June 8, 2007 3-7615/260 588

Pay to the order of Commonwealth of Pennsylvania \$ 360.00
Three hundred and sixty (For medical license) Dollars

Citizens Bank
Pennsylvania

For For Renewal of medical license # 037579-L T. BAZARGANI, M.D.
⑆036076150⑆ 6214744727⑈ 0260 ⑈0080036000⑈

999999001 218 061807 06
CITIZENS BANK 055/05 051/001
RIVERSIDE RJ 06192007
011500120
4200013836

NO. 98240666

PAY TO THE ORDER OF
COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF STATE - SPDA

0312007304
PHILA, PA 0-195007 2578
0420453836

Posting Date 2007 Jun 19
Posting Seq No 42013836
Account Number 6214744727
Check Number 240
Amount \$360.00

Tawoos Bazargani, M.D.
Apt. No.43
One Christian Street
Philadelphia, PA. 19147

Certified Mail No.7006-2150-0004-5673-9982

State Board of Medicine
P.O. Box 2649
Harrisburg, PA. 17105

June 30,2007

RE: Reinstatement of The Medical License of
Tawoos Bazargani, M.D. No.037579-L

The following are the description of the cause and the conditions for the above identified medical license:

1. I, Tawoos Bazargani, M.D. (hereinafter “ Dr. Bazargani “) has obtained my medical license in year 1978 and since initiation of my medical license I have practiced only in Pennsylvania and has always been in total compliance with renewing my medical license and obtaining the required Continuing Medical Education.
2. I, Dr. Bazargani, during last three decades, on a very organized Manner, have received the application and the related documents from the Harrisburg Office, for renewal of my medical license which I have processed accordingly and therefore have received the renewed medical license.
3. For a reason unknown to myself I, Dr. Bazargani, have not, last year, received the routine mail from the Harrisburg Office for renewal of my medical license and merely because of Harrisburg Office’s intact discipline and its orderliness in providing myself, Dr. Bazargani, with the required materials and needed documents for renewing my medical license, therefore, the expiration and renewal of my medical license has lapsed my attention. I, have requested about the date when the last application has been mailed so that I can do the proper investigation in that regard.
4. Immediately after I, Dr. Bazargani, has noticed the expired license I have written my letter to Harrisburg Office where I have enclosed a check for \$360.00 and have requested for the renewal of my license.

5. There has not been any changes in my practice in year 2007 from the previous years and I, Dr. Bazargani, as the previous years, have been employed and have been practicing adult psychiatry in John F. Kennedy Community Mental Health Mental Retardation Center where I evaluate the patients, initiate treatment, and follow up the patient for their psychiatric treatment. I, Dr. Bazargani's part time practice has remained very limited and in year 2007 I have not accepted any new patients in order to keep the practice limited to the patients had already been under my treatment.
6. I, Dr. Bazargani, for more than two decades have had my liability medical insurance with Pennsylvania medical society liability Insurance Company (" PMSLIC ") and have not had a single claim against my practice, a copy of the PMSLIC' certification for medical liability insurance is enclosed.
7. I, Dr. Bazargani, has almost attended all conferences held for better patient care and better patients' treatment by John F. Kennedy Community Mental Health Mental Retardation Center. I, Dr. Bazargani, also have, on yearly basis, successfully participated, in Risk Management Program in patients' treatment held by PMSLIC and have earned the required continuing medical education for risk management of the patients.
8. The Pennsylvania CME requirement for (MD) Unrestricted License under section " The Following Exemptions Apply For Certain Physicians " has documented as follow: " A physician who is seeking to instate an inactive or lapsed license shall show proof of compliance with the continuing education requirement for the preceding renewal period.
9. I have enclosed a copy of the Continuing Medical Education (" CME ") which I have earned from June 2003 through December 2004 which totaling of ninety one hours of category one (1) CME, as a proof of compliance with the continuing education requirement for the preceding renewal period as documented in the above paragraph No.8. Because, very unexpectedly, the package which included my CME documents from the year 2005 through present has been missing in Dr. Bazargani's, (myself) condominium apartment located in the condominium building where I am the only occupant but not the only one who has access to the entire condominium apartment. I have also enclosed a copy of the document for four (4) hours of category one (1) CME dated March 3,2007 which I just earned it and the document has not yet

been placed in the above mentioned missing package. I, Dr. Bazargani, have also registered to attend another conference in short future which certifies for four (4) hours of category 1 CME, plus I will be attending many more conferences by the end of this year. Please consider that not renewing Dr. Bazargani's, myself, medical license because of the continuing education could do much more damages to Dr. Bazargani's patients and the doctor herself than what the above mentioned missing package containing the recent CME can do.

10. It has been Dr. Bazargani's (myself) understanding that fortunately the total requirement for CME has increased up to one hundred hours please inform me about the deadline which the physicians have been mandated to complete earning one hundred hours of CME.
11. I, Dr. Bazargani have enclosed a copy of PMSLIC's certification for my Medical Liability Insurance which would remain valid until January 1,2008 Plus a check for \$30.00 as it has been instructed in the enclosed application, the check written for \$360.00 has already been cashed.

Please do not hesitate to contact me if there is any further question.

Enclosures: 1-A check for \$30.00
2-A description of C.V.
3- A copy of PMSLIC's Certification for Medical Liability Insurance.
4-Completed Application including Pages 1,2,and 3.
5- the copies of CME

Very truly yours

Tawoos Bazargani, M.D.

Tawoos Bazargani, M.D.
Apt. No.43
One Christian Street
Philadelphia, PA. 19147

Certified Mail No.

Ms. Nancy Read
State Board of Medicine
P.O. Box 2649
Harrisburg, PA. 17105

June 30,2007

RE: Reinstatement of The Medical License of
Tawoos Bazargani, M.D. No.037579-L

Dear Ms. Read:

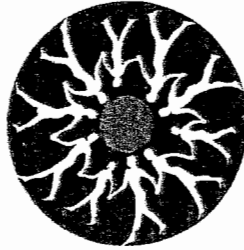
Enclosed please find the check No.254 for \$30.00 which is written for the renewal of the above identified medical license. The rest of the requirement has been mailed with the original package and the check for \$360.00 has already been cashed. A copy of the Curriculum Vitae has been enclosed

Thanking you in advance for your consideration in this matter.

Very truly yours

Tawoos Bazargani, M.D.


Delores Wilson Esq
Chairperson
Board of Directors



Jo Williamson
President/CEO

MEMORANDUM

HAND DELIVERED

TO: Dr. Tawoos Bazargani
FROM: Dina Pescatore, Human Resources Officer 
DATE: July 20, 2007
RE: Suspension of Employment Contract

Your services are temporarily suspended effective July 20, 2007 until you provide a valid physician's license.

Please keep me apprised of your progress in obtaining such license. You will be required to show an original license in order to be re-instated.

If you should have any questions, please feel free to contact me at 215-568-0860, x3381.

DP:sc

cc: Human Resources File
Dr. Robert Bass
Fari Thompson

Tawoos Bazargani, M.D.
Apt. No.43
One Christian Street
Philadelphia, PA. 19147

Certified Mail No.7006-2760-0003-2171-4497

State Board of Medicine
P.O. Box 2649
Harrisburg, PA. 17105

August 12,2007

RE: Reinstatement of The Medical License of
Tawoos Bazargani, M.D. No.037579-L

My curriculum vitae since the expiration of my medical license has been mailed with certified mail to the above address on June 30, 2007, in a package, including the completed and signed application for reinstatement of my medical license plus completed and signed of page three (3) of the application, also a check for \$360.00 and Continuing Medical Education (hereinafter "CME") except for those which were missing. To this date I have not received my renewed medical license and my patients continued to be deprived from my medical care because of not receiving my renewed medical license. This wring is a continuum of my previous writings involving the renewal of my medical license. The followings involving the chronology of my expired medical license are documented again.

1. For a reason unknown to myself I, Tawoos Bazargani, M.D. have not received, during the last year, the routine mail from the Harrisburg Office for renewal of my medical license and merely because of Harrisburg Office's intact discipline and its orderliness in providing myself, with the required materials and needed documents for renewing my medical license, therefore, the expiration and renewal of my medical license has lapsed my attention. I, have requested about the date when the timely application for renewal of my medical license has been mailed so that I can do the proper investigation in that regard and so far I have not received any certain date.

2. Immediately after I, Tawoos Bazargani, M.D. have noticed the expired license I have written my letter to the Medical Board at Harrisburg Office where I have also enclosed a check for \$360.00, the required amount for renewal of my license. My check was cashed by June 19, 2007 and by June 30,2007 I have forwarded the completed and signed application

August 12, 2007

Certified Mail No.7006-2760-0003-2171-4497

-Page 2-

package for renewal of my license as it has been detailed in the above first paragraph .

3. There has not been any changes in my practice in year 2007 from the previous years and I have been, as the previous years, employed and have been practicing adult psychiatry in John F. Kennedy Community Mental Health Mental Retardation Center where I evaluate the patients, initiate treatment, and follow up the patients for their psychiatric treatment. My part time practice has remained very limited and in year 2007 I have not accepted any new patients in order to keep the practice limited to the patients that had already been under my treatment whom solely remain under my care.

4. On Friday July 20, 2007 my patients had to be deprived from my professional care because my job has been terminated because I have not yet received my renewed medical license.

5. On June 30, 2007, as it has been documented in the above first paragraph, I have mailed the completed and signed application for reinstatement of my medical license including page number three (3) of the application plus the required check and my preceding CME to the above identified address.

6. The State Board of Medicine's letter dated July 30, 2007 has documented about signing page three (3) of the application, which I had already signed and mailed by certified mail of June 30, 2007 and will mail , again with this Curriculum Vitae, and it has also documented about the Continuing Medical Education. I have enclosed the following CME credits with the present application: A- The copies of certificates for CME which are dated from 2005 through the present time which totaling of sixty five hours plus three fourth of an hour (65.75) of category one (1) credits. B- I have enclosed a certificate of registration and, therefore, attendance in a medical conference which is titled " Women in Medicine " which certifies for a total of fifteen hours plus a quarter of hour and I have earned about thirteen (13) hours credits of category one (1) credit a copy of which will be forwarded to the above identified office as soon as it becomes available. C- I have been participating on yearly basis in risk management education provided by the company which insures my practice for any malpractice,

August 12, 2007

Certified Mail No. 7006-2760-0003-2171-4497

-Page 3-

that is, Pennsylvania Medical Society liability Insurance company (PMSLIC) which usually is about six (6) credits of category one (1) credit, and the copies of these missing certificates also will be forwarded to the above identified office immediately after the copies become available. D- Consequently, my total CME credits at the time of this application has added up to a total of ninety hours plus three fourth of an hour (90.75 hours). E- Considering the fact that it has been only recently that the required CME credits has increased from sixty (60) hours in to one hundred (100) hours in the biennial period, consequently, the authorities has strongly emphasized that there should be noticeable flexibility about the time period during which the physicians are mandated about earning one hundred (100) credits. F- Finally I am planning to earn another one hundred (100) CME credits of category one (1) by the end of year 2008 which will make me eligible of continuing to have a valid medical license. I also plan to earn another additional nine (9) hours plus one quarter of hour (9.25) in order to make the current credits a total of one hundred (100) hours of category one (1) credits if the laws involving the CME requires myself to do so.

7. The Pennsylvania CME requirement for (MD) Unrestricted License under section "The Following Exemptions Apply For Certain Physicians" has documented as follow: "A physician who is seeking to instate an inactive or lapsed license shall show proof of compliance with the continuing education requirement for the preceding renewal period."

8. Indeed I am an innocent victimized physician and a psychiatrist who has successfully practiced in Pennsylvania for about thirty (30) years with noticeable patient satisfaction and no complain against my patient care who has proven of having a routine pattern of meeting more than required CME, on a on going basis, and being eager in enhancing her knowledge through CME.

CONCLUSION: My patients and myself are merely the innocent victims of the above documented circumstances, to minimize the damages on my patients as well as myself I am forwarding the certificates of (90.75 hours) ninety hours plus three fourth of an hour CME which I have earned during the last few years, the certificates for sixty five hours plus three quarter of hour (65.75 hours) has already been enclosed and for another

August 12, 2007

Certified Mail No.7006-2760-0003-2171-4497

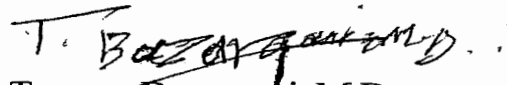
-Page 4-

thirteen hours (13 hours) I have already enclosed the registration receipt which I have received personally while present for the conference and a copy of the certificate will be forwarded immediately after it becomes available which totals of (78.75 hours) seventy eight hours plus three quarter of an hour and the certificates for the remaining will be forwarded as soon as I receive a copy of the old missing certificates. Furthermore, I am aware that by the end of 2008 I must earn another one hundred hours (100 hours) of CME category one (1) in order to maintain a valid medical license plus another nine hours and one quarter of one hour (9.25 hours) if the law requires so.

I also enclosed the check No.279 for \$35.00 as the requirement for an expired license.

Please do not hesitate to contact me if there is any further question.

Very truly yours


Tawoos Bazargani, M.D.

Enclosures:

The copies of CME certificates

The check No.279 for \$35.00

The completed and signed page 3

Of the application

A copy of the application dated June 30, 2007

7006 2760 0003 2171 4497

U.S. Postal Service™	
CERTIFIED MAIL™ RECEIPT	
(Domestic Mail Only; No Insurance Coverage Provided)	
For delivery information visit our website at www.usps.com	
HARRISBURG, PA 17105	
OFFICIAL USE	
Postage	\$ 1.31
Certified Fee	\$2.65
Return Receipt Fee (Endorsement Required)	\$0.00
Restricted Delivery Fee (Endorsement Required)	\$0.00
Total Postage & Fees	\$ 3.96

0104
 PHILA PA 19104
 #1 M.O.F.W.
 Postmark
 Here
 AUG 14 2007
 08/14/2007
 USPS

Sent To	State Board of Medicine
Street, Apt. No., or PO Box No.	P.O. Box 2649
City, State, ZIP+4	Harrisburg, Pa. 17105

PS Form 3800, August 2006 See Reverse for Instructions

Tawoos Bazargani, M.D.
40 Old Lancaster Road
No.406
Merion, PA. 19066

Ms. Tammy Radel
Board Administrator
Pennsylvania State Board of Medicine
P.O. Box 2649
Harrisburg, PA. 17105

November 7, 2008

Re: Ten Days Notice In Reference To
Tawoos Bazargani, M. D.' s Medical License

Dear Ms. Radel:

This Notice follows my previous letters addressed to the office of Pennsylvania State Board of Medicine, at the above identified address, in reference to renewal of my medical license. I (Tawoos Bazargani, M.D.) as a physician and a psychiatrist have successfully practiced in Pennsylvania for almost three decades. In December 2006, the office of the Pennsylvania State Board of Medicine, for a cause totally unknown to myself, has not renewed my medical license which has led in to abrupt termination of my practice, and therefore being deprived from my legitimate rights of practicing medicine in Pennsylvania. This Notice is to inform you that, a legal action will be taken against Pennsylvania State Board of Medicine, because of those documented above in this letter, unless my medical license has been renewedrenewedreinstated and I have been compensated for the damages by the due date of this notice and no further notice will be given.

Please do not hesitate to contact me if there is any question.

Very truly yours

Tawoos Bazargani, M. D.

[Back to Search](#) > Case #2008-33281

- Case Details

Case Number	2008-33281
Commencement Date	11/21/2008
Case Type	Complaint Civil Action
PFA Number	
Caption Plaintiff	BAZARGANI, TAWOOS
Caption Defendant	RADEL, TAMMY
Lis Pendens Indicator	No
Status	5 - OPEN/ON APPEAL
Judge	DEMCHICK-ALLOY
Parcel Number	
Remarks	
Sealed	No
Interpreter Needed	

Docket Date Range: [Docket Entries](#)

[Advanced Case Print](#)

- Plaintiffs

Name	Address	Country	Counsel	Notify	Sequence
BAZARGANI, TAWOOS	40 OLD LANCASTER RD NO 406 MERION, PA 19066 UNITED STATES	UNITED STATES		Yes	1

- Defendants

Name	Address	Country	Counsel	Notify	Sequence
RADEL, TAMMY	2601 NORTH THIRD ST HARRISBURG, PA 17110 UNITED STATES	UNITED STATES	UNGER, SUE ANN	Yes	1
COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF STATE BUREAU OF PROFESSIONAL AND OCCUPATIONAL AFFAIRS	2610 NORTH THIRD ST HARRISBURG, PA 17110 UNITED STATES	UNITED STATES	UNGER, SUE ANN	Yes	2
PENNSYLVANIA STATE BOARD OF MEDICINE	2601 NORTH THIRD ST HARRISBURG, PA 17110 UNITED STATES	UNITED STATES	UNGER, SUE ANN	Yes	3

- Garnishees

- Other Party Types

- Dockets

Seq.	Filing Date	Docket Type	Docket Text	Sealed	Filing ID
0	11/21/2008	Complaint Civil Action		No	7245597
1	11/21/2008	Civil Cover Sheet		No	7245600
2	12/9/2008	(Internal Use Only) Served	OFFICE OF ADMINISTRATION PA STATE BOARD OF MEDICINE ON 12/02/2008 DAUPHIN COUNTY	No	7262132
3	12/9/2008	(Internal Use Only) Served	MS TAMMY RADEL ON 12/02/2008 DAUPHIN COUNTY	No	7262143
4	E 12/22/2008	Preliminary Objections of	TAMMY RADEL	No	7276814
5	E 12/22/2008	Affidavit/Certificate of Service of	PRELIMINARY OBJECTIONS & MEMO OF LAW ON 12/22/2008	No	7276829
6	E 12/22/2008	Memorandum of Law	BY COMMONWEALTH PARTY	No	7276833
7	E 12/22/2008	Affidavit/Certificate of Service of	PREL OBJ & MEMORANDUM OF LAW ON 12/22/2008	No	7276836
8	12/30/2008	Amended Complaint		No	7285808
9	1/13/2009	(Internal Use Only) Served	COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF STATE BUREAU OF PROFESSIONAL AND OCCUPATIONAL AFFAIRS ON 1/6/09 BY DAUPHIN CO	No	7301128
10	E 1/14/2009	Preliminary Objections of	COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF STATE BUREAU OF PROFESSIONAL	No	7302136

			AND OCCUPATIONAL AFFAIRS		
11	E 1/14/2009	Affidavit/Certificate of Service of	COMMONWEALTH PARTY'S PRELIMINARY OBJECTIONS TO PLAINTIFF'S AMENDED COMPLAINT ON 01/14/2009	No	7302143
12	E 1/14/2009	Memorandum of Law	BY COMMONWEALTH PARTY	No	7302149
13	E 1/14/2009	Affidavit/Certificate of Service of	COMMONWEALTH PARTY'S MEMORANDUM OF LAW TO PLAINTIFF'S AMENDED COMPLAINT ON 01/14/2009	No	7302152
14	E 1/28/2009	Praec for Argument	MATTER IS APPEALABLE - PREL OBJS	No	7317158
15	E 1/28/2009	Affidavit/Certificate of Service of	ARGUMENT PRAECIPE ON 01/28/2009	No	7317186
16	E 1/28/2009	Entry of Appearance	OF SUE ANN UNGER FOR TAMMY RADEL, PENNSYLVANIA STATE BOARD OF MEDICINE, COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF STATE BUREAU OF PROFESSIONAL AND OCCUPATIONAL AFFAIRS	No	7318026
17	E 1/28/2009	Affidavit/Certificate of Service of	PRAECIPE FOR APPEARANCE ON 01/28/2009	No	7318039
18	2/3/2009	Objection/Opposition	PLTF TO DEFT REQUEST FOR ARGUMENT PRAECIPE & PLTF VERIFICATION OF DEADLINE DATE FOR FILING PLTF RESPONSE TO DEFTS PREL OBJECTION	No	7324727
19	2/3/2009	Affidavit/Certificate of Service of	OBJECTION TO DEFT REQUEST FOR ARGUMENT PRAECIPE & VERIFICATION OF DEADLINE DATE ON 2/3/2009	No	7324731
20	E 2/4/2009	Reply	BY COMMONWEALTH DEFTS TO PLTF'S OBJECTION TO ARGUMENT PRAE & PLTF'S MOT FOR RELIEF & VERIFICATION	No	7326248
21	E 2/4/2009	Affidavit/Certificate of Service of	RESPONSE ON 02/04/2009	No	7326254
22	E 2/4/2009	Memorandum of Law	BY COMMONWEALTH DEFENDANTS	No	7326264
23	E 2/4/2009	Affidavit/Certificate of Service of	MEMORANDUM OF LAW ON 02/04/2009	No	7326274
24	2/11/2009	Affidavit/Certificate of Service of	PLTF OBJS TO DEFTS REQ FOR ARGUMENT PRAE & PLTF'S VERIFICATION OF DEADLINE DATE FOR FILING PLTF'S RESP TO DEFTS PREL OBJ ON 02/03/2009	No	7333408
25	2/18/2009	Objection/Opposition	TO DEFT RESPONSE BY PLTF	No	7339673
26	2/18/2009	Memorandum of Law	BY PLTF	No	7339683
27	2/18/2009	Affidavit/Certificate of Service of	OBJECTION TO DEFT RESPONSE ON 2/18/2009	No	7339687
28	2/20/2009	Affidavit/Certification of Service w/Rule Returnable	OF OBJS TO DEFTS RESPONSE ON 2/18/2009	No	7342301
29	E 2/26/2009	Preliminary Objections of	COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF STATE BUREAU OF PROFESSIONAL AND OCCUPATIONAL AFFAIRS; PENNSYLVANIA STATE BOARD OF MEDICINE; TAMMY RADEL	No	7348669
30	E 2/26/2009	Affidavit/Certificate of Service of	PRELIMINARY OBJECTION TO PLF'S AMENDED COMPLAINT ON 02/25/2009	No	7348752
31	E 2/27/2009	Praec to Withdraw	PRELIMINARY OBJECTIONS FILED ON 2/26/2009	No	7351582
32	E 2/27/2009	Affidavit/Certificate of Service of	PRAECIPE TO WITHDRAW ON 02/27/2009	No	7351724
33	3/19/2009	Objection/Opposition	PLTF TO ANS OF PREL OBJ & WITHDRAWAL OF PREL OBJS	No	7374980
34	3/19/2009	Memorandum of Law	BY PLTF	No	7374984
35	3/19/2009	Affidavit/Certificate of Service of	OBJ TO ANS OF PREL OBJ ON 03/19/2009	No	7374987
36	3/23/2009	Affidavit/Certification of Service w/Rule Returnable	OF OBJECTION TO DEFT RESPONSES OF PREL OBJECTIONS ON 3/19/2009	No	7379430
37	4/2/2009	Order	OF 4/1/09 KEHS CA CC	No	7391548
38	4/17/2009	Motion	(EMERG) TO REQUEST FOR CONTINUATION OF DEADLINE DATE FOR FILING PLTF'S BRIEF OF ABOVE IDENTIFIED CLAIM BY PLTF	No	7409654
39	4/17/2009	Affidavit/Certificate of Service of	REQUEST OF CONTINUATION OF DEADLINE DATE ON 4/17/2009	No	7409666
40	E 4/20/2009	Answer/Response	BY COMMONWEALTH DEFENDANTS TO PLAINTIFF'S EMERGENCY MOTION	No	7410640
41	E 4/20/2009	Affidavit/Certificate of Service of	RESPONSE OF COMMONWEALTH DEFENDANTS TO PLAINTIFF'S EMERGENCY MOTION AND EXHIBITS ON 04/20/2009	No	7410693
42	E 4/20/2009	Memorandum of Law	BY COMMONWEALTH DEFENDANTS	No	7410702
43	E 4/20/2009	Affidavit/Certificate of Service of	COMMONWEALTH DEFENDANTS' MEMORANDUM OF LAW IN SUPPORT OF THEIR RESPONSE TO PLAINTIFF'S EMERGENCY MOTION ON 04/20/2009	No	7410711
44	E 4/20/2009	Praec to Attach	EXHIBITS D1, D2 TO RESPONSE OF COMMONWEALTH DEFENDANTS TO PLAINTIFF'S EMERGENCY MOTION	No	7411509
45	E 4/20/2009	Affidavit/Certificate of Service of	PRAECIPE TO ATTACH ON 04/20/2009	No	7411553
46	4/21/2009	Affidavit/Certification of Service w/Rule Returnable	OF EMERGENCY MOT TO REQ FOR CONTINUATION ON 04/17/2009	No	7412243
47	4/21/2009	Brief	BY PLTF PURSUANT TO COURT ORDER 4/1/09 IN REFERENCE TO PREL OBJS	No	7412855
48	4/21/2009	Affidavit/Certificate of	BRIEF ON 4/21/2009	No	7412857

49	4/23/2009	Service of Affidavit/Certification of Service w/Rule Returnable	OF BRIEF ON 04/21/2009	No	7415363
50	4/27/2009	Order	(SUR PLTF MOTION TO REQUEST FOR CONTINUATION OF DEADLINE FOR FILING BRIEF OF ABOVE IDENTIFIED CLAIM) OF 4/23/09 DANIELE, J MOTION DENIED AS MOOT CC	No	7418178
51	5/15/2009	Motion	FOR LEAVE OF COURT FOR AMENDMENT OF ABOVE INDENTIFIED COMPLT BY PLTF	No	7443106
52	5/15/2009	Memorandum of Law	BY PLTF	No	7443109
53	5/15/2009	Affidavit/Certificate of Service of	MOT FOR LEAVE FOR AMENMENT OF COMPLT ON 5/15/2009	No	7443110
54	5/15/2009	Amended Complaint	SECOND	No	7443113
55	5/18/2009	Affidavit/Certificate of Service of	REQUEST FOR LEAVE OF COURT ON 5/15/2009	No	7444763
56	5/18/2009	Affidavit/Certificate of Service of	SECOND AMENDED COMPLT ON 5/15/2009	No	7444830
57	5/19/2009	Notice	FOR BEING ON LEAVE BY PLTF	No	7445272
58	5/19/2009	Affidavit/Certificate of Service of	NOTICE FOR BEING ON LEAVE ON 5/18/2009	No	7445277
59	5/20/2009	Rule	DATE ON 06/23/09 KEHS, CA	No	7448175
60	E 6/1/2009	Preliminary Objections of	TAWOOS BAZARGANI; COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF STATE BUREAU OF PROFESSIONAL AND OCCUPATIONAL AFFAIRS; PENNSYLVANIA STATE BOARD OF MEDICINE; TAMMY RADEL	No	7460053
61	E 6/1/2009	Memorandum of Law	BY TAMMY RADEL, PENNSYLVANIA STATE BOARD OF MEDICINE, AND COMMONWEALTH OF PENNSYLVANIA, DEPT OF STATE BUREAU OF PROFESSIONAL AND OCCUPATIONAL AFFAIRS	No	7460094
62	E 6/5/2009	Answer/Response	BY DEFENDANTS TO PLAINTIFF'S "MOTION FOR LEAVE OF COURT FOR AMENDMENT OF THE ABOVE IDENTIFIED COMPLAINT"	No	7466324
63	E 6/5/2009	Memorandum of Law	BY DEFENDANTS TAMMY RADEL, PENNSYLVANIA STATE BOARD OF MEDICINE AND COMMONWEALTH OF PENNSYLVANIA, DEPARTMENT OF STATE, BUREAU OF PROFESSIONAL AND OCCUPATIONAL AFFAIRS	No	7466334
64	6/25/2009	Preliminary Objections of	BY PLTF TAWOOS BAZARGANI M.D.'S TO DEMAND FOR DISMISSAL OF THE ABOVE DEFTS PRELIMINARY OBJECTION OF JUNE 5, 2009 BC OF IMPROPER SERVICE & BC OF THEIR FAILURE TO SUBSTANTIATE ANY BASE FOR THEIR MOTION	No	7491437
65	6/25/2009	Memorandum of Law	IN SUPPORT OF PLTF'S PRELIMINARY OBJECTIONS	No	7491445
66	6/25/2009	Affidavit/Certificate of Service of	PLTF TAWOOS BAZARGANI M.D.S PRELIMINARY OBJECTION ON 06/25/2009	No	7491448
67	E 6/26/2009	Praec for Argument	MATTER IS APPEALABLE - PRELIMINARY OBJECTIONS	No	7492868
68	E 6/26/2009	Affidavit/Certificate of Service of	ARGUMENT PRAECIPE ON 06/26/2009	No	7492890
69	6/29/2009	Affidavit/Certification of Service w/Rule Returnable	OF PREL OBJECTIONS ON 6/25/2009	No	7493767
70	6/29/2009	Answer/Response	BY PLTF TO ARGUMENT PRAECIPE	No	7494505
71	6/29/2009	Affidavit/Certificate of Service of	RESPONSE ON 6/29/2009	No	7494509
72	E 6/30/2009	Reply	BY PENNSYLVANIA STATE BOARD OF MEDICINE TO COMMONWEALTH DEFENDANTS	No	7495619
73	E 6/30/2009	Memorandum of Law	BY TAMMY RADEL COMMONWEALTH OF PENNSYLVANIA STATE BOARD OF MEDICINE PENNSYLVANIA STATE BOARD OF MEDICINE, COMMONWEALTH OF PENNSYLVANIA, DEPARTMENT OF STATE BUREAU OF PROFESSIONAL AND COCUPATIONAL AFFAIRS	No	7495746
74	E 6/30/2009	Affidavit/Certificate of Service of	RESPONSE OF COMMW DEFENDANTS TO PLF'S PRELIM OBJECTION TO DEMAND FOR DISMISSAL ON 06/30/2009	No	7495798
75	E 6/30/2009	Affidavit/Certificate of Service of	COMMW DEFENDANTS MEMO OF LAW IN SUPPORT OF THEIR RESP TO PLFS PRELIMINARY OBJECTION ON 06/30/2009	No	7495807
76	7/1/2009	Affidavit/Certification of Service w/Rule Returnable	OF RESPONSE TO ARGUMENT PRAECIPE ON 6/26/2009	No	7497186
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78	7/27/2009	Memorandum of Law	BY PLTF	No	7528482
79	7/27/2009	Affidavit/Certificate of Service of	BRIEF ON 07/27/2009	No	7528483
80	7/29/2009	Affidavit/Certification of Service w/Rule Returnable	OF BRIEF ON 7/27/2009	No	7532344
81	8/3/2009	Order	OF 7/30/09 DANIELE, J PLTF SECOND AMENDED COMPLAINT STRICKEN WITHOUT PREJUDICE DEFT PRELIMINARY OBJECTIONS TO SECON AMENDED COMPLAIND DENIED WITHOUT PREJUDICE PLT MOTION TO AMEND AMENDED COMPLAINT GRANTED ALL OTHER MATTERS FILED ON OR BEFORE 7/29/09 ARE DENIED CC	No	7535825
82	8/17/2009	Amended Complaint		No	7553215
83	8/17/2009	Affidavit/Certificate of Service of	SECOND AMENDED COMPLAINT ON 08/17/2009	No	7553219
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85	8/19/2009	Affidavit/Certificate of Service of	SECOND AMENDED COMPLT ON 08/17/2009	No	7556514
86	E 8/24/2009	Preliminary Objections of	COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF STATE BUREAU OF PROFESSIONAL AND OCCUPATIONAL AFFAIRS; PENNSYLVANIA STATE BOARD OF MEDICINE; TAMMY RADEL	No	7561811
87	E 8/24/2009	Memorandum of Law	BY TAMMY RADEL, COMMONWEALTH OF PENNSYLVANIA, STATE BOARD OF MEDICINE, AND COMMONWEALTH OF PENNSYLVANIA, DEPT OF STATE BUREAU OF PROFESSIONAL AND OCCUPATIONAL AFFAIRS	No	7561817
88	E 8/25/2009	Affidavit/Certificate of Service of	PRELIMINARY OBJECTIONS TO PLAINTIFF'S SECOND AMENDED COMPLAINT ON 08/24/2009	No	7562063
89	E 8/25/2009	Affidavit/Certificate of Service of	MEMORANDUM OF LAW IN SUPPORT OF PRELIMINARY OBJECTIONS TO SECOND AMENDED COMPLAINT ON 08/24/2009	No	7562087
90	E 9/11/2009	Praec for Argument	MATTER IS APPEALABLE - PRELIMINARY OBJECTIONS	No	7583352
91	E 9/11/2009	Affidavit/Certificate of Service of	ARGUMENT PRAECIPE ON 09/11/2009	No	7583401
92	9/14/2009	Preliminary Objections of	PLTF PURSUANT TO DEFTS REDUNDANT & IMMATERIAL PREL OBJS OF THE ABOVE CLAIM	No	7585668
93	9/14/2009	Memorandum of Law	BY PLTF	No	7585669
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97	E 9/22/2009	Affidavit/Certificate of Service of	RESPONSE OF COMMONWEALTH DEFENDANTS TO PLAINTIFF'S PRELIMINARY OBJECTION TO THEIR PENDING PRELIMINARY OBJECTIONS TO PLAINTIFF'S SECOND AMENDED COMPLAINT ON 09/22/2009	No	7599405
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99	E 9/22/2009	Memorandum of Law	BY RADEL, PENNSYLVANIA STATE BOARD OF MEDICINE, COMMONWEALTH OF PENNSYLVANIA, DEPARTMENT OF STATE BUREAU OF PROFESSIONAL AND OCCUPATIONAL AFFAIRS	No	7599416
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102	9/28/2009	Affidavit/Certificate of Service of	OBJ ON 09/24/2009	No	7605247
103	10/6/2009	Notice of Scheduling		No	7615665
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105	11/10/2009	Memorandum of Law	BY PLTF	No	7658218
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